

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Docket No. 16-CR-40025-TSH
(1) IVAN CRUZ-RIVERA and)	
(2) CARLOS JIMENEZ)	
)	
Defendants.)	

Government's Exhibit List (11/5/18)

	Description
1	DEA Exhibit 12 (heroin purchased by CS from SG 10/4/2013)
2	DEA Form 7 and Laboratory Report relating to Exhibit 12 (00048-49)
3	Photograph #1 of money and cell phones seized from NJ Lexus (00189)
4	Photograph #2 of money seized from NJ Lexus (00190)
5	N-84 Envelope from Agustin Flores to Segundo Gutierrez (00177)
6	N-85 Receipt from Ivan Cruz Rivera to Raquel Flores for \$2000 (00177)
7	Photocopy of (2) \$1000 money orders send to Segundo Gutierrez by Agustin Flores (00178)
8	Rule 5 documents signed by Ivan Cruz-Rivera
9	Statement of Ivan Cruz-Rivera regarding \$44,000 seized (00093)
10	Documents submitted by Ivan Cruz-Rivera to Worcester County District Attorney's Office making claim against \$44,000 seized (00094-100 and 00179-84)
11	Traffic Citation issued to Carlos Jimenez on 10/4/2013 (01408-09)
12	N-45 (audio / video recording from UC vehicle on 10/4/2013) (00224)
13	N-46 (audio / video recording from CS's person on 10/4/2013) (00225)
14	N-48 (consensually recorded telephone call on 10/14/2013) (00226)

15	N-49 (audio / video recording of meeting on 10/22/2013) (00227)
16	Verizon Wireless bills for Segundo Gutierrez (978-868-3324) (00138-65)
17	Verizon Wireless bills for Christine Jimenez (732-887-2581) (00166-75)
18	Tracfone Wireless records for 787-222-8866 (01515-31)
19	Verizon Wireless records for 978-868-3324 (01532-654 and 01693)
20	Verizon Wireless records for 732-887-2581 (01532-654 and 01690)
22	CV for Senior Forensic Chemist Vadim Astrakhan (01446-47)
23	CV for Trooper Felipe Martinez (01448-50)
24	Calls from Segundo Gutierrez made from prison in FL to Ivan Cruz-Rivera (00222-23)
25	Calls from Segundo Gutierrez made from Wyatt to Ivan Cruz-Rivera (00214-21)
26	Call Log from Wyatt (00199)
27	BOP records relating to calls from Segundo Gutierrez (00236-239)
28	Recording with dispatch from 10/4/2013 car stop (00914)
29	Photograph of Ivan Cruz-Rivera identified by Segundo Gutierrez (00088)
30	Photograph of Carlos Jimenez identified by Segundo Gutierrez (00089)
31	N-67 Segundo Gutierrez iPhone
32	Surveillance notes from 10/4/2013 (01381-85 and 01397-404)
33	Photographs of 105/107 Union Street January 2014 (01679-89)
34	Segundo Gutierrez Cooperation Agreement (00895-99)
35	Detection Records relating to Jari (00271-451)
36	Training Records relating to Jari (00452-881)
37	Certification Records for Trooper Patrick Robinson and K-9 Jari (00882-83)

The government reserves the right to supplement this list with additional exhibits identified in the discovery or as the need to call additional witnesses becomes clear during trial preparation.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

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Dated: November 5, 2018

CERTIFICATE OF SERVICE

This is to certify that I have served counsel of record for the Defendant a copy of the foregoing document by ECF.

/s/ Michelle L. Dineen Jerrett
MICHELLE L. DINEEN JERRETT
Assistant U.S. Attorney

Dated: November 5, 2018